



DIVISION OF
ENFORCEMENT

UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
100 PEARL STREET, SUITE 20-100
NEW YORK, NY 10004-2616

November 3, 2022

By ECF

Hon. Kenneth M. Karas
United States District Court
United States Courthouse
300 Quarropas Street, Chambers 533
White Plains, New York 10601-4150

Re: *U.S. Securities and Exchange Commission v. Bronson et al.*,
12-CV-6421 (KMK)

Dear Judge Karas:

I write on behalf of the Securities and Exchange Commission (“SEC”) to ask the Court to compel witnesses to appear at the evidentiary hearing scheduled for December 12, 2022.

As background, the SEC sought an evidentiary hearing after discovering concerning conduct in connection with the removal of the Court-appointed liquidation trustee; transfers and sales of securities subject to the Liquidation Order, DE 278; and additional income generated but not paid to the SEC. What’s more, Bronson’s then attorney, Rachmuth, appears to have aided in Bronson’s execution of the penny stock trades subject to the liquidation order and then deposited some of those funds into his escrow account. To stem any further potential asset dissipation and contempt the SEC sought and, on November 3, 2022, the Court granted an evidentiary hearing on these issues. In addition, the Court stated that the Court would order the witnesses to appear and asked the SEC to submit a letter with the witness’ names.

As such, the SEC respectfully requests that the Court order the following witnesses to appear and testify if called upon on December 12, 2022 at 10:30 a.m.: Edward Bronson, Dawn Bronson, John Kellas, Bruce Bent, Paul Strickland, Paul Rachmuth in his personal capacity, for his law firm and for Phase 1 Operations, Inc., Marc Pena, and Ryan Stumphauzer. If so ordered, the SEC will ensure the Court’s Order is served on each of the witnesses.

Respectfully submitted,
s/ Maureen Peyton King

The Court grants this request and directs the SEC to submit a proposed order to the Court forthwith.

So Ordered.

11/3/22